

September 16, 2021

Via ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

United States v. Evelin Jimenez, 18 Cr. 879 (SHS) Request for Adjournment of Sentencing Hearing

Honorable Judge Stein:

I write on behalf of Ms. Jimenez and with the consent of the Government to respectfully request an adjournment of Ms. Jimenez's sentencing hearing, currently scheduled for September 28, 2021, to a Monday or Friday date in November, 2021, or any date thereafter that is convenient to the Court. This adjournment is necessary because due to the ongoing pandemic we have not been able to fully complete our sentencing investigation nor received all the necessary sentencing letters for Ms. Jimenez's sentencing hearing. Ms. Jimenez remains at liberty on bond since her arrest on November 14, 2018 and has been fully compliant with all of her bond conditions (see PSR ¶ 13). Ms. Jimenez also continues to be gainfully employed in her full-time work at a day-care center where she has been employed since 2016 (PSR ¶ 149) and is doing very well. Thus she will not be negatively impacted by an adjournment of her sentencing hearing.

The government consents to our request for the adjournment. We request a date in November 2021. Available dates for the defense are November 1, 5, 8, 12, 2021, or any Monday or Friday thereafter in November that is convenient to this Court.

The sentencing is adjourned to November 5, 2021, at 11:00 a.m. The defense submissions are due by October 15, the government submissions are due by October 22.

Respectfully,

s Judith Vargas

Judith Vargas, Esq.

Dated: New York, New York September 20, 2021

SO ORDERED

Sidney H. Stein, U.S.D.J.

NEW YORK 20 Vesey Street * Suite 400 * New York, NY 10007 Tel: 212.668-0024 * Fax: 212.668.0060 PUERTO RICO SATELLITE

MCS Plaza * Suite 1200 * Ponce de Leon Avenue
San Juan, PR 00917

Judithvargas1@aol.com